

### **REMARKS**

Reconsideration and allowance of the subject application are respectfully requested. By this Amendment, Applicant has cancelled claims 17-26. Accordingly, upon entry of this Amendment, claims 1-16 are all the claims pending in the application. In response to the Office Action, Applicant respectfully submits that the claims define patentable subject matter.

#### **I. Overview of the Office Action**

Claims 1-4 and 8 are rejected under 35 U.S.C. § 102(e) as being anticipated by Nakamura et al. (U.S. Patent No. 7,154,452, hereafter “Nakamura”).<sup>1</sup> Claims 15 and 16 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Nakamura in view of Someya et al. (U.S. Patent No. 6,759,996, hereafter “Someya”) and further in view of Nishida (U.S. Patent No. 5,767,818). Claims 5-7 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 9-14 are allowed.

#### **II. Preliminary Matters**

##### **A. Foreign Priority**

Applicant thanks the Examiner for acknowledging Applicant’s claim for Foreign Priority, and confirming receipt of a certified copy of the priority document in the United States Patent and Trademark Office.

##### **C. Claim Objection**

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<sup>1</sup> Applicant notes that the Office Action states that claim 1-5 and 8 are rejected. Applicant assumes that this is a typographical error since claim 5 is indicated as being allowable. Applicant requests clarification from the Examiner in the next Office Action.

By this Amendment, Applicant has amended claim 1 in order to improve clarity.

Accordingly, the Examiner is requested to remove the objection to claim 1.

### **III. Prior Art Rejections**

#### **A. Rejection of claims 1-4 under 35 U.S.C. § 102(e)**

##### **Disclosure of Nakamura**

Nakamura generally relates to an electronic paper file in which electronic papers 10 can be attached or detached from a main unit 20. The electronic paper 10 has a display 11 with display luminescence control means 22 for displaying display data obtained from signal sending receiving means 23. A connecting terminal 13 is provided at a side of the electronic paper 10, and connects the electronic paper 10 to a connecting terminal 21 of the main unit 20. This connection allows the electronic paper 10 to be attached and detached from the main unit 20 (column 3, lines 39-50). The data which is displayed on the electronic paper may be data which is transmitted from an external source or data which is stored in a storage 60 (column 5, lines 2-11).

##### **Analysis**

Amended claim 1 recites in part:

a holding stand, for substantially vertically holding the plurality of thin display devices, having a transmission unit for transmitting the image data to the thin display devices,

wherein a front surface of the holding stand has a U-shaped section at both of side ends and a lower end.

Applicant respectfully submits that there is no teaching or suggestion in Nakamura of the feature “wherein a front surface of the holding stand has a U-shaped section at both of side ends and a lower end”, as recited in the claim. Nakamura discloses a plurality of thin display devices

10 (column 10, lines 61-67), each having a communication unit 13 for transmitting and receiving image data (column 5, lines 6-11), and a display unit 11. Nakamura also discloses a holding stand, which the Examiner appears to read on the main unit 20, which has a transmission unit 23 for transmitting the image data to the display devices 10 and for vertically holding the plural display devices (FIG. 8).

However, Applicant respectfully submits that it is quite clear that Nakamura does not teach or suggest that the holding stand has a U-shaped section at both of side ends and the lower end. Nakamura teaches storing papers in a side-stapled manner. On the contrary, the claimed invention discloses that the electronic paper can be inserted or picked up from above, and therefore the front-most surface of the carrying case 20A has a U-shaped section at both of the side ends and the lower ends (pages 52-53 of the original specification).

**B. Rejection of claim 8 under 35 U.S.C. § 102(e)**

The Examiner contends that Nakamura teaches or suggests all of the features of independent claim 8. Applicant respectfully disagrees with the Examiner's position, and submits that claim 8 is not anticipated by Nakamura.

Claim 8 recites in part:

writing image data expressing an image which has already been written in the plurality of thin display devices in thin display devices respectively located one surface behind thin display devices in which the image data is already written; and

writing the latest image data designated to be written in a thin display device located at a frontmost surface of the plurality of thin display devices.

With this feature of claim 8, images which have already been displayed on the electronic papers 10 are sequentially sent to the electronic papers on the rear side without removing the

electronic papers from the holding stand. Display control is performed to display the latest image on the front-most electronic. Accordingly, a recently written image which is frequently used can be displayed on the front-most electronic paper.

Applicant respectfully submits that this feature is neither taught nor suggested by Nakamura. The Examiner cites column 13, lines 33-39 and column 14, lines 30-57 of Nakamura as allegedly disclosing this feature of the claim. However these cited portions of Nakamura merely disclose that detection means detects the connection of an electronic page at a connecting terminal. When a display luminescence control means 22 receives notification of the connecting terminal numbers, the display luminescence control means 22 displays image data in the order of the connecting terminal number, in order to allow the display of image data in a particular page or numerical order.

Nowhere do these cited portions (or any other portion) of Nakamura disclose writing image data expressing an image which has already been written in the plurality of display devices in display devices located one surface behind display devices in which the image data is already written; and writing the latest image data designated to be written in a display device located at a front-most surface of the plurality of thin display devices as required by independent claim 8.

Accordingly, Applicant respectfully submits that claim 8 should be allowable because the cited references do not teach or suggest all of the features of the claims.

**C. Rejection of claims 15 and 16 under 35 U.S.C. § 103(a)**

With respect to independent claim 15 and analogous independent claim 16, the Examiner acknowledges that Nakamura does not teach or suggest:

pages of the thin display devices are connected in series with each other and for sequentially transmitting the image data to the plurality of thin display devices, wherein:

the host device includes

an adding unit for adding, to the image data, page information expressing a page to be displayed in the plurality of thin display devices held as a plurality of pages, and

a transmission unit for transmitting the image data, to which the page information has been added by the adding unit, to the thin display devices; and

each of the thin display devices includes

a receiving unit for receiving the image data to which the page information has been added,

a decision unit for comparing the page information of the image data received by the receiving unit and page setting information preset for each thin display device depending on the series connections between the thin display devices with each other to decide whether or not the page information and the page setting information coincide with each other,

a control unit for controlling the display of the display units based on a decision result of the decision unit, and

a sending unit for sending the image data, to which the page information has been added, to the thin display device of the subsequent page or the host device.

The Examiner thus relies on Nishida and Someya to cure these deficiencies. Applicant respectfully submits that claim 15 and analogous claim 16 would not have been rendered obvious in view of the cited references.

Nishida generally relates to a display device which includes plural display units 50 arranged in a matrix. The display units include display elements 10, a memory 52 and a

controller 53. A display signal which includes address information and data information is supplied to a signal transmission line, and each controller 53 controls an associated regulator 51 to turn a display element on or off based on the display information in the display signal.

The Examiner alleges that Nishida discloses various features of claim 15 and analogous claim 16. In particular, the Examiner asserts that Nishida discloses the pages of the thin display devices are connected in series with each other and image data is sequentially transmitted to the plurality of thin display devices.

Although Nishida may disclose a system that comprises plural display units connected in series, wherein signals may be sequentially transmitted to each display unit (column 6, lines 23-34), Applicant submits that Nishida has little or no relevance to the instant invention. There is no disclosure in Nishida that the display devices are electronic pages which may be attached or detached from a main unit. In fact, Nishida teaches away from this object by disclosing that the display units are “housed fixedly in a casing 100” (column 6, lines 10-13).

The Examiner further alleges that Nishida discloses “a sending unit for sending the image data, to which the page information has been added, to the thin display device of the subsequent page or the host device”, and asserts that “since the data is sent sequentially, it is inherent that there be a sending unit to send the data to the subsequent (next) page.”<sup>2</sup> However, the Examiner has not addressed (or provided support for) the feature “sending image data, to which page information has been added”, as required by the claims. There is no teaching or suggestion in Nishida that page information is added to image data to be displayed.

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<sup>2</sup> Page 6 of the Office Action dated May 16, 2007.

Further, the Examiner has provided no supportable objective reasoning why one of ordinary skill in the art would have been motivated to modify Nakamura in view of Nishida. The Examiner contends that it would be obvious to modify Nakamura by the teachings of Nishida “because the wirings would be simplified and able to accommodate an increased number of displays”. This rationale is flawed for at least the following reasons.

There is no apparent need in Nakamura to connect the terminals 21 in series in order to be able more display units. Nakamura discloses an overlapping structure for the connecting terminals that allows the easy addition of electronic paper (column 10, lines 61-67). Accordingly, there would be no basis to redesign the wiring of the connecting terminals of Nakamura to a series connection in order to add more display devices, thereby undermining the Examiner’s basis for the combination.

Moreover, the Examiner does not address how or why one of ordinary skill in the art would have been able to modify Nakamura in view of Nishida to produce the claimed invention since the Nakamura reference is based on the parallel connection of electronic pages which may be attached and detached from a main unit, while Nishida relates to an electric bulletin board comprising plural display units connected in series. The references are directed to completely different objects such that there is no reason to combine their teachings in view of each other.

The Examiner alleges that Someya discloses “an adding unit for adding, to the image data, page information expressing a page to be displayed in the plurality of thin display devices held as a plurality of pages, and a transmission unit for transmitting the image data, to which the page information has been added by the adding unit, to the thin display devices; and each of the thin display devices includes a receiving unit for receiving the image data to which the page information has been added, a decision unit for comparing the page information of the image

data received by the receiving unit and page setting information preset for each thin display device depending on the series connections between the thin display devices with each other to decide whether or not the page information and the page setting information coincide with each other, a control unit for controlling the display of the display units based on a decision result of the decision unit, and a sending unit for sending the image data, to which the page information has been added, to the thin display device of the subsequent page or the host device”, as recited in claim 15 and analogously recited in claim 16. Applicant respectfully disagrees with the Examiner’s position.

Someya discloses an image signal generating unit 1 which supplies images to display units having different unit numbers. Index information, which designates a display unit by which an image is to be displayed, is embedded in an image signal. Each display unit compares its unit number with the index signal to select displayable frames of the image signal.

Applicant respectfully submits that there is no teaching or suggestion in Someya of “adding, to the image data, page information expressing a page to be displayed in the plurality of thin display devices”, as required by claims 15 and 16.

Further, Applicant respectfully submits that there is no teaching or suggestion in Someya of “a decision unit for comparing the page information of the image data received by the receiving unit and page setting information preset for each thin display device depending on the series connections between the thin display devices with each other to decide whether or not the page information and the page setting information coincide with each other”, as required by the claims.

The Examiner cites column 6, lines 61-64 of Someya as allegedly disclosing this feature of the claims. However, this cited portion of Someya merely discloses that how an index tester



11 tests the bits at a bit position corresponding to a unit number output by a unit number setting device 10. Nowhere does this portion (or any other portion) of Someya disclose “a decision unit for comparing the page information of the image data received by the receiving unit and page setting information preset for each thin display device depending on the series connections between the thin display devices with each other to decide whether or not the page information and the page setting information coincide with each other”, as required by the claims.

Further, there is no teaching or suggestion in Someya of “a control unit for controlling the display of the display units based on a decision result of the decision unit, and a sending unit for sending the image data, to which the page information has been added, to the thin display device of the subsequent page or the host device”, as required by the claims. Since page information is not added to the image data in the system of Someya, Someya cannot disclose sending image, data to which page data has been added, to the display units, as claimed.

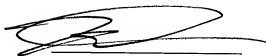
Accordingly, Applicant respectfully submits that claims 15 and 16 should be allowable because the cited references do not teach or suggest all of the features of the claims, and one of ordinary skill in the art would not have been motivated to modify or combine the reference to produce the claimed invention.

With regard to the Examiner’s Statement on Reasons for Allowance, Applicant notes that the claims should be deemed allowable based on their respective recitations, rather than the paraphrase of language set forth by the Examiner.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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